

Federal Defenders  
OF NEW YORK, INC.

Southern District  
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June 18, 2025

**VIA ECF**

Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/20/2025
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**Re: United States v. Luis Bonilla a/k/a Bartolo Maldonado  
24 CR 35 (MKV)**

Dear Judge Vyskocil:

I write to respectfully request that the Court extend the deadline for the defense's sentencing submission to one week before the sentencing hearing, rather than two weeks before sentencing, in light of delays we have encountered in obtaining necessary records. The government has no objection to this request.

On May 12, 2025, Mr. Maldonado pled guilty to violating the conditions of his supervised release by committing the New York state offense of endangering the welfare of a child. He is scheduled to appear before the Court for sentencing on Wednesday, July 9, 2025. Consistent with its individual rules, the Court set the deadline for the defense's sentencing submission at two weeks before sentencing.

In connection with sentencing, the defense has been seeking to obtain copies of Mr. Maldonado's underlying Bureau of Prisons records, as he spent 25 years – much of his adulthood – in federal prison. However, as Mr. Maldonado was prosecuted and incarcerated in his underlying case under the alias "Luis Bonilla,"<sup>1</sup> the defense has encountered delays in obtaining his Bureau of Prisons records. Accordingly, and in order to afford the defense additional time to obtain and review Mr. Maldonado's BOP records, I request that the Court extend the deadline for the defense's submission to Wednesday, July 2, 2025, one week before sentencing, with the government's

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<sup>1</sup> Also on May 12, 2025, following a joint motion from the parties, the Court amended the caption in this case from "United States v. Luis Bonilla," to "United States v. Luis Bonilla, aka Bartolo Maldonado," after the defense presented evidence that Mr. Maldonado's true name is "Bartolo Maldonado" and he was previously prosecuted under an alias.

response being due Monday July 7, 2025, two days before sentencing. I have conferred with counsel for the government, who has no objection to this request.

Respectfully submitted,

/s/ Hannah McCrea


Hannah McCrea

Assistant Federal Defender

cc: AUSA Benjamin Burkett

The defense submission is due by July 1, 2025, and the government submission is due by July 3, 2025.  
SO ORDERED.

Date: June 20, 2025  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge